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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

| | |
|---------------------------|---|
| Proceeding | 91199905 |
| Party | Plaintiff Dallas Manufacturing Co., Inc. |
| Correspondence Address | SUSAN HWANG SHEPPARD MULLIN RICHTER & HAMPTON LLP 333 SOUTH HOPE STREET, 43rd FLOOR LOS ANGELES, CA 90071 UNITED STATES gclark@sheppardmullin.com, shwang@sheppardmullin.com |
| Submission | Stipulated/Consent Motion to Extend |
| Filer's Name | Susan Hwang |
| Filer's e-mail | shwang@sheppardmullin.com |
| Signature | /Susan Hwang/ |
| Date | 12/09/2011 |
| Attachments | 159761-MotToExt.PDF (3 pages)(40791 bytes) |

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

DALLAS MANUFACTURING CO., INC.

Opposer,

v.

IMJ MARKETING INC.

Applicant.

Opposition No. 91199905

Serial No. 85/105,221

Mark: COZY CRAFT PET BEDS

Filed: August 11, 2010

Published: January 25, 2011

CONSENT MOTION TO EXTEND DISCOVERY AND TRIAL DATES

Opposer, Dallas Manufacturing Company, Inc., through its counsel of record, hereby requests the Trademark Trial and Appeal Board to extend the remaining discovery and trial dates in the above-identified proceeding by sixty (60) days, up to and including the dates set forth in the table below.

| Action | Current Deadline | Extended Deadline |
|---------------------------------------|-----------------------------|------------------------------|
| Initial Disclosures Due | 12/12/2011 | 02/10/2012 |
| Expert Disclosures Due | 04/10/2012 | 06/09/2012 |
| Discovery Closes | 05/10/2012 | 07/09/2012 |
| Opposer's Pretrial Disclosures | 06/24/2012 | 08/23/2012 |
| Opposer's 30-day Trial Period Ends | 08/08/2012 | 10/07/2012 |
| Applicant's Pretrial Disclosures | 08/23/2012 | 10/22/2012 |
| Applicant's 30-day Trial Period Ends | 10/07/2012 | 12/06/2012 |
| Opposer's Rebuttal Disclosures | 10/22/2012 | 12/21/2012 |
| Opposer's 15-day Rebuttal Period Ends | 11/21/2012 | 01/20/2013 |

The motion is not for purposes of delay. The parties discussed potential settlement options during the discovery conference and require additional time in order to further explore these possibilities.


In e-mail correspondence on December 5, 2011, Opposer's counsel Susan Hwang of Sheppard, Mullin, Richter & Hampton LLP, obtained the consent of Applicant's counsel, Jeffrey Dweck of The Law Firm of Jeffrey S. Dweck, P.C., to the granting of this motion.

For the reasons set forth above, Applicant respectfully requests that the Board grant the requested extension.

December 9, 2011

Respectfully submitted,

SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

By: 
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CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing CONSENT MOTION TO EXTEND DISCOVERY AND TRIAL DATES was served by first class mail, postage prepaid, on December 9, 2011 upon counsel for Applicant IMJ Marketing Inc. at the following address:

Jeffrey Dweck
The Law Firm of Jeffrey S. Dweck, P.C.
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New York, NY 10001-2914


BETTY I. RODRIGUEZ